

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

FILED
U.S. DISTRICT COURT
MIDDLE DISTRICT OF TENN.
DEC 08 2010
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UNITED STATES OF AMERICA)
)
)
v.)
)
)
[1] CHRISTOPHER CONYERS)
a/k/a "SNOOTY")
)
[2] FAITH READUS)
)
[3] PAUL McQUIDDY)
a/k/a "C-PAUL" a/k/a "C-TRU")
)
[4] HOWARD COLEMAN)
a/k/a "CRUSH")
)
[5] TOMEKA COLEMAN)
)
[6] THOMAS BRANUM)
a/k/a "CRIP-PINE" a/k/a "ALPINE")
)
[7] ADAM BATTLE)
a/k/a "A-CRIP" a/k/a "A.C.")
)
[8] MONTERIUS POLLARD)
a/k/a "MONSTER" a/k/a "MON")
)
[9] CECIL WHITMON, III)
a/k/a "FETTI")
)
[10] MICHAEL DEVONN DAVIS)
a/k/a "M-60")
)
[11] TIERRA YOUNG)
a/k/a "RELLA")
)

NO. 3:09-00240
Judge Nixon

18 U.S.C. § 2
18 U.S.C. § 371
18 U.S.C. § 752(a)
18 U.S.C. § 922(g)(1)
18 U.S.C. § 922(n)
18 U.S.C. § 924
18 U.S.C. § 924(c)
18 U.S.C. § 1951
21 U.S.C. § 846

[12] JERMAINE M. SMITH)
a/k/a "C-YELLA")
)
[13] AKIN I. FLOYD)
a/k/a "F-LOC")
)
[14] SAMANTHA COLLINS)
)
[15] ANTONIO LEE)
a/k/a "MERL")
)
[16] OMEGA HARRIS)
a/k/a "NINO" a/k/a "Q")
)
[17] LEONARD BAUGH)
a/k/a "C-HYPE" a/k/a "HYPE")
)
[18] JAMES LAMONT OLIVER, JR.)
a/k/a "YELLA BOY")
)
[19] LASONDRA DOWELL)
a/k/a "SONDRA")
)
[20] LACHAUNTI WILLIAMS)
a/k/a "WILDLIFE")
)
[21] CHRISTOPHER MOODY)
)
[22] BIONCA BUTLER)
a/k/a "C-TRILL")

SIXTH SUPERSEDING INDICTMENT

COUNT ONE

THE GRAND JURY CHARGES:

1. Between in or around June 2009 through on or about September 25, 2009, in the Middle District of Tennessee, [1] **CHRISTOPHER CONYERS**, a/k/a "SNOOTY" and [2]

FAITH READUS willfully, knowingly, and unlawfully did combine, conspire, confederate, and agree with each other and with others known and unknown, to commit an offense against the United States, to wit: aiding and assisting the escape and attempt to escape, from federal custody, of J.S., a person under arrest upon process issued under any law of the United States for federal felony offenses and awaiting sentencing after conviction by jury in the Middle District of Tennessee of federal offenses relating to multiple murders, conducting a continuing criminal enterprise, other drug trafficking offenses, money laundering offenses, firearms offenses, obstruction of justice, and other federal offenses in criminal case 3:98-00038 in the United States District Court for the Middle District of Tennessee in violation of Title 18, United States Code, Section 752.

OVERT ACTS

2. In furtherance of the conspiracy and to effect the objects thereof, CHRISTOPHER CONYERS, a/k/a "SNOOTY," FAITH READUS, and co-conspirators, including J.S., performed one or more of the following overt acts in the Middle District of Tennessee:

a. J.S. communicated telephonically and in writing with CHRISTOPHER CONYERS, a/k/a "SNOOTY," and FAITH READUS, as well as other co-conspirators, regarding a plan to locate a privately owned helicopter, having other street gang members meet and restrain the owner of the helicopter, and taking the helicopter.

b. CHRISTOPHER CONYERS, a/k/a "SNOOTY," possessed information conveyed by J.S. regarding the above described plan to obtain a helicopter.

c. FAITH READUS researched information about features and prices for used privately owned helicopters.

d. FAITH READUS provided information regarding helicopters to J.S..

All in violation of Title 18, United States Code, Section 371.

COUNT TWO

THE GRAND JURY FURTHER CHARGES:

Between in or around June 2009 and on or about September 25, 2009, in the Middle District of Tennessee, [1] **CHRISTOPHER CONYERS, a/k/a “SNOOTY”** and [2] **FAITH READUS**, did aid and assist the attempt to escape of J.S., a person under arrest upon process issued under any law of the United States for federal felony offenses and awaiting sentencing after conviction by jury in the Middle District of Tennessee of federal offenses relating to multiple murders, conducting a continuing criminal enterprise, other drug trafficking offenses, money laundering offenses, firearms offenses, obstruction of justice, and other federal offenses in criminal case 3:98-00038 in the United States District Court for the Middle District of Tennessee.

In violation of Title 18, United States Code, Section 752(a).

COUNT THREE

THE GRAND JURY FURTHER CHARGES:

On or about October 29, 2008, in the Middle District of Tennessee and elsewhere, [12] **JERMAINE M. SMITH a/k/a “C-YELLA,”** and [13] **AKIN I. FLOYD a/k/a “F-LOC”** did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to unlawfully obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery and extortion, as those terms are defined in Title 18,

United States Code, Section 1951, and to commit and threaten physical violence to another person known as “Buck” in furtherance of a plan and purpose to commit such a robbery and extortion.

In violation of Title 18, United States Code, Sections 1951 and 2.

COUNT FOUR

THE GRAND JURY FURTHER CHARGES:

On or about October 29, 2008, in the Middle District of Tennessee and elsewhere, [12] **JERMAINE M. SMITH a/k/a “C-YELLA,”** and [13] **AKIN I. FLOYD a/k/a “F-LOC”** did knowingly possess and brandish a firearm in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to commit a Hobbs Act extortion and robbery in violation of Title 18, United States Code, Section 1951.

In violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT FIVE

THE GRAND JURY FURTHER CHARGES:

Between on or around October 4, 2008 to on or about October 29, 2008, in the Middle District of Tennessee, [12] **JERMAINE M. SMITH a/k/a “C-YELLA,”** having previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one (1) year, did knowingly possess, in and affecting commerce, a firearm, to wit: a Ruger P95 9mm pistol with a laser sight and an extended clip.

In violation of Title 18, United States Code, Sections 922(g)(1), 924, and 2.

COUNT SIX

THE GRAND JURY FURTHER CHARGES:

On or about November 2, 2008, in the Middle District of Tennessee and elsewhere, [7] **ADAM BATTLE a/k/a "A-CRIP" a/k/a "A.C.," and [12] JERMAINE M. SMITH a/k/a "C-YELLA,"** did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to unlawfully obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery and extortion, as those terms are defined in Title 18, United States Code, Section 1951, and to commit and threaten physical violence to another person known as "Buck" and to the property of "Buck" in furtherance of a plan and purpose to commit such a robbery and extortion.

In violation of Title 18, United States Code, Sections 1951 and 2.

COUNT SEVEN

THE GRAND JURY FURTHER CHARGES:

On or about November 2, 2008, in the Middle District of Tennessee and elsewhere, [7] **ADAM BATTLE a/k/a "A-CRIP" a/k/a "A.C.," and [12] JERMAINE M. SMITH a/k/a "C-YELLA,"** did knowingly possess and discharge a firearm in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to commit a Hobbs Act extortion and robbery in violation of Title 18, United States Code, Section 1951.

In violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT EIGHT

THE GRAND JURY FURTHER CHARGES:

Between in or around January 2009 to in or around February 2009, in the Middle District of Tennessee and elsewhere, [12] **JERMAINE M. SMITH a/k/a “C-YELLA,”** [13] **AKIN I. FLOYD a/k/a “F-LOC,”** and [14] **SAMANTHA COLLINS** did combine, conspire, confederate, and agree with each other and with J.S. and others known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with the intent to distribute controlled substances, including five grams or more of a mixture and substance containing a detectable amount of cocaine base, that is crack cocaine, and a quantity of a mixture and substance containing a detectable amount of cocaine, Schedule II controlled substances, and a quantity of marijuana, a Schedule I controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846.

COUNT NINE

THE GRAND JURY FURTHER CHARGES:

Between in or around January 2009 to on or about March 23, 2009, in the Middle District of Tennessee, [7] **ADAM BATTLE a/k/a “A-CRIP” a/k/a “A.C.,”** and [15] **ANTONIO LEE a/k/a “MERL,”** did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to unlawfully obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery and extortion, as those terms are defined in Title 18, United States Code, Section 1951, and to commit and threaten

physical violence to a person located at or near Neldia Court, Nashville, Tennessee, in furtherance of a plan and purpose to commit such a robbery and extortion.

In violation of Title 18, United States Code, Sections 1951 and 2.

COUNT TEN

THE GRAND JURY FURTHER CHARGES:

Between in or around January 2009 to on or about March 23, 2009, in the Middle District of Tennessee, [7] **ADAM BATTLE a/k/a "A-CRIP" a/k/a "A.C.,"** and [15] **ANTONIO LEE a/k/a "MERL,"** did knowingly possess and brandish a firearm in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to commit a Hobbs Act extortion and robbery in violation of Title 18, United States Code, Section 1951.

In violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT ELEVEN

THE GRAND JURY FURTHER CHARGES:

On or about September 5, 2009, in the Middle District of Tennessee, [3] **PAUL McQUIDDY a/k/a "C-PAUL" a/k/a "C-TRU,"** [4] **HOWARD COLEMAN a/k/a "CRUSH,"** [6] **THOMAS BRANUM a/k/a "CRIP PINE" a/k/a "ALPINE,"** [7] **ADAM BATTLE a/k/a "A-CRIP" a/k/a "A.C.,"** [8] **MONTERIUS POLLARD a/k/a "MONSTER" a/k/a "MON,"** [11] **TIERRA YOUNG a/k/a "RELLA,"** [1] **CHRISTOPHER CONYERS a/k/a "SNOOTY,"** [16] **OMEGA HARRIS a/k/a "NINO" a/k/a "Q,"** [9] **CECILWHITMON, III a/k/a "FETTI,"** and [17] **LEONARD BAUGH a/k/a "C-HYPE" a/k/a "HYPE"** did knowingly and intentionally combine, conspire, confederate and agree with

each other and with other persons known and unknown to unlawfully obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery and extortion, as those terms are defined in Title 18, United States Code, Section 1951, and to commit and threaten physical violence to another person known as "Lil Ced" and to the property of "Lil Ced" and others, in furtherance of a plan and purpose to commit such a robbery and extortion.

In violation of Title 18, United States Code, Sections 1951 and 2.

COUNT TWELVE

THE GRAND JURY FURTHER CHARGES:

On or about September 5, 2009, in the Middle District of Tennessee, [3] **PAUL McQUIDDY a/k/a "C-PAUL" a/k/a "C-TRU,"** [4] **HOWARD COLEMAN a/k/a "CRUSH,"** [6] **THOMAS BRANUM a/k/a "CRIP PINE" a/k/a "ALPINE,"** [7] **ADAM BATTLE a/k/a "A-CRIP" a/k/a "A.C.,"** [8] **MONTERIUS POLLARD a/k/a "MONSTER" a/k/a "MON,"** [11] **TIERRA YOUNG a/k/a "RELLA,"** [1] **CHRISTOPHER CONYERS a/k/a "SNOOTY,"** [16] **OMEGA HARRIS a/k/a "NINO" a/k/a "Q,"** [9] **CECIL WHITMON, III a/k/a "FETTI,"** and [17] **LEONARD BAUGH a/k/a "C-HYPE" a/k/a "HYPE"** did knowingly possess a firearm in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to commit a Hobbs Act extortion and robbery in violation of Title 18, United States Code, Section 1951.

In violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT THIRTEEN

THE GRAND JURY FURTHER CHARGES:

On or about September 10, 2009, in the Middle District of Tennessee, [3] **PAUL McQUIDDY a/k/a "C-PAUL" a/k/a "C-TRU,"** [6] **THOMAS BRANUM a/k/a "CRIP PINE" a/k/a "ALPINE,"** [10] **MICHAEL DEVONN DAVIS a/k/a "M-60,"** [9] **CECILWHITMON, III a/k/a "FETTI,"** and [17] **LEONARD BAUGH a/k/a "C-HYPE" a/k/a "HYPE"** did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to knowingly and intentionally possess with intent to distribute a quantity of controlled substances, including cocaine, a Schedule II controlled substance, in violation of Title 21, United States Code, Section 841(a)(1).

In violation of Title 21, United States Code, Section 846 and Title 18, United States Code, Section 2.

COUNT FOURTEEN

THE GRAND JURY FURTHER CHARGES:

On or about September 10, 2009, in the Middle District of Tennessee, [3] **PAUL McQUIDDY a/k/a "C-PAUL" a/k/a "C-TRU,"** [6] **THOMAS BRANUM a/k/a "CRIP PINE" a/k/a "ALPINE,"** [10] **MICHAEL DEVONN DAVIS a/k/a "M-60" [9]** **CECILWHITMON, III a/k/a "FETTI,"** and [17] **LEONARD BAUGH a/k/a "C-HYPE" a/k/a "HYPE"** did knowingly possess a firearm in furtherance of a drug trafficking crime for which they may be prosecuted in a court of the United States, that is, conspiracy to possess cocaine with intent to distribute in violation of Title 21, United States Code, Section 846.

In violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT FIFTEEN

THE GRAND JURY FURTHER CHARGES:

On or about September 10, 2009, in the Middle District of Tennessee, [1] **CHRISTOPHER CONYERS a/k/a "SNOOTY,"** having previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one (1) year, did knowingly possess, in and affecting commerce, a firearm, to wit: a Sphinx 9mm semi-automatic handgun.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924.

COUNT SIXTEEN

THE GRAND JURY FURTHER CHARGES:

On or about September 10, 2009, in the Middle District of Tennessee, [1] **CHRISTOPHER CONYERS a/k/a "SNOOTY,"** having previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one (1) year, did knowingly possess, in and affecting commerce, ammunition, to wit: 9mm Luger ammunition.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924.

COUNT SEVENTEEN

THE GRAND JURY FURTHER CHARGES:

Between on or about April 9, 2009 to on or about April 12, 2009, in the Middle District of Tennessee, [18] **JAMES LAMONT OLIVER, JR. a/k/a "YELLA BOY,"** who was then under indictment for a crime punishable by imprisonment for a term exceeding one year, to wit: aggravated robbery in case 2009-A-287, in the Criminal Court of Davidson County, Tennessee, did willfully receive a firearm, that is, a folding Kel Tec Sub 2000 firearm, said firearm having been shipped and transported in interstate commerce.

In violation of Title 18, United States Code, Section 922(n) and 924.

COUNT EIGHTEEN

THE GRAND JURY FURTHER CHARGES:

Between on or about April 9, 2009 to in or around July, 2009, in the Middle District of Tennessee, [16] **OMEGA HARRIS a/k/a "NINO" a/k/a "Q"** having previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one (1) year, did knowingly possess, in and affecting commerce, a firearm, to wit: a folding Kel Tec Sub 2000 firearm.

In violation of Title 18, United States Code, Sections 922(g)(1), 924, and 2.

COUNT NINETEEN

THE GRAND JURY FURTHER CHARGES:

On or about September 29, 2009, in the Middle District of Tennessee, [3] **PAUL McQUIDDY a/k/a "C-PAUL" a/k/a "C-TRU,"** [6] **THOMAS BRANUM a/k/a "CRIP PINE" a/k/a "ALPINE,"** and [9] **CECIL WHITMON, III, a/k/a "FETTI"** did knowingly and intentionally combine, conspire, confederate and agree with each other and with other persons known and unknown to unlawfully obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery and extortion, as those terms are defined in Title 18, United States Code, Section 1951, and to commit and threaten physical violence to another person by committing an armed robbery of a vehicle emissions inspection station ^{at} located at 3494 Dickerson Pike, Nashville, Tennessee, and operated by SysTech International as a contractor for the Nashville Metro Health Department, in furtherance of a plan and purpose to commit such a robbery and extortion.

In violation of Title 18, United States Code, Sections 1951 and 2.

COUNT TWENTY

THE GRAND JURY FURTHER CHARGES:

On or about September 29, 2009, in the Middle District of Tennessee, [3] **PAUL McQUIDDY a/k/a "C-PAUL" a/k/a "C-TRU,"** [6] **THOMAS BRANUM a/k/a "CRIP PINE" a/k/a "ALPINE,"** and [9] **CECIL WHITMON, III, a/k/a "FETTI"** did knowingly possess a firearm in furtherance of a crime of violence for which they may be prosecuted in a court of the United States, that is, conspiracy to commit a Hobbs Act extortion and robbery in violation of Title 18, United States Code, Section 1951.

In violation of Title 18, United States Code, Sections 924(c) and 2.

COUNT TWENTY-ONE

THE GRAND JURY FURTHER CHARGES:

Between in or around September 2009 through on or about November 12, 2009, in the Middle District of Tennessee, [4] **HOWARD COLEMAN a/k/a "CRUSH"** having previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one (1) year, did knowingly possess, in and affecting commerce, firearms, to wit: a Smith and Wesson, Model Airweight, .38 special revolver, a Smith and Wesson, Model Airweight 442-1, .38 special revolver, a Taurus Model PT 111 PRO, 9mm pistol, and a Leinad, Inc., model PM-11, 9mm Cobray MAC-11 style firearm.

In violation of Title 18, United States Code, Sections 2, 922(g)(1) and 924.

COUNT TWENTY-TWO

THE GRAND JURY FURTHER CHARGES:

Between on or about October 24, 2009 through on or about November 12, 2009, in the Middle District of Tennessee, [5] **TOMEKA COLEMAN** having previously been convicted in any court of a crime punishable by imprisonment for a term exceeding one (1) year, did knowingly possess, in and affecting commerce, firearms, to wit: a Smith and Wesson, Model Airweight, .38 special revolver, a Smith and Wesson, Model Airweight 442-1, .38 special revolver, a Taurus Model PT 111 PRO, 9mm pistol, and a Leinad, Inc., model PM-11, 9mm, Cobray MAC-11 style firearm.

In violation of Title 18, United States Code, Sections 2, 922(g)(1), and 924.

COUNT TWENTY-THREE

THE GRAND JURY FURTHER CHARGES:

Between on or about September 10, 2009, to on or about September 15, 2009, in the Middle District of Tennessee and elsewhere, [11] **TIERRA YOUNG a/k/a "RELLA,"** [19] **LASONDRA DOWELL a/k/a "SONDRA"** [17] **LEONARD BAUGH a/k/a "HYPE,"** and [20] **LACHAUNTI WILLIAMS a/k/a "WILDLIFE"** did combine, conspire, confederate, and agree with each other and with others known and unknown to the Grand Jury, to knowingly and intentionally distribute and possess with the intent to distribute five grams or more of a mixture and substance containing a detectable amount of cocaine base, that is crack cocaine, and a quantity of a mixture and substance containing a detectable amount of cocaine, Schedule II controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846 and Title 18, United States Code, Section 2.

COUNT TWENTY-FOUR

THE GRAND JURY FURTHER CHARGES:

Between on or about September 10, 2009, to on or about September 15, 2009, in the Middle District of Tennessee, [11] **TIERRA YOUNG a/k/a “RELLA,”** and [19] **LASONDRA DOWELL a/k/a “SONDRA,”** in, on, and within 1000 feet of the real property comprising a housing facility owned by a public housing authority, to wit: 1307 12th Avenue South in the public housing development generally known as Edgehill Apartments, Nashville, Tennessee, did unlawfully, knowingly, and intentionally possess with the intent to distribute five grams or more of a mixture and substance containing a detectable amount of cocaine base, that is crack cocaine, and a quantity of a mixture and substance containing a detectable amount of cocaine, Schedule II controlled substances.

In violation of Title 21, United States Code, Sections 841(a)(1) and 860 and Title 18, United States Code, Section 2.

COUNT TWENTY-FIVE

Between in or around April 2009, to on or about September 15, 2009, in the Middle District of Tennessee and elsewhere, [21] **CHRISTOPHER MOODY** did combine, conspire, confederate, and agree with LaSondra Dowell, who is not a defendant in this count, and others unknown, to knowingly and intentionally possess with the intent to distribute five grams or more of a mixture and substance containing a detectable amount of cocaine base, that is crack cocaine, and a quantity of a mixture and substance containing a detectable amount of cocaine, Schedule II controlled substances, in violation of Title 21, United States Code, Section 841(a)(1).

All in violation of Title 21, United States Code, Section 846 and Title 18, United States Code, Section 2.

COUNT TWENTY-SIX

THE GRAND JURY FURTHER CHARGES:

Between in or around April 2009, to on or about September 10, 2009, in the Middle District of Tennessee, [21]**CHRISTOPHER MOODY**, in, on, and within 1000 feet of the real property comprising a housing facility owned by a public housing authority, to wit:1307 12th Avenue South in the public housing development generally known as Edgehill Apartments, Nashville, Tennessee, did unlawfully, knowingly, and intentionally possess with the intent to distribute five grams or more of a mixture and substance containing a detectable amount of cocaine base, that is crack cocaine, and a quantity of a mixture and substance containing a detectable amount of cocaine, Schedule II controlled substances.

In violation of Title 21, United States Code, Sections 841(a)(1) and 860 and Title 18, United States Code, Section 2.

COUNT TWENTY-SEVEN

THE GRAND JURY FURTHER CHARGES:

On or about September 13, 2009, in the Middle District of Tennessee, [22] **BIONCA BUTLER a/k/a "C-TRILL"** did knowingly and intentionally combine, conspire, confederate and agree with other persons known and unknown to unlawfully obstruct, delay, and affect commerce as that term is defined in Title 18, United States Code, Section 1951, and the movement of articles and commodities in such commerce, by robbery and extortion, as those terms are defined in Title 18, United States Code, Section 1951, and to commit and threaten physical violence to another person known as "Bear," in furtherance of a plan and purpose to commit such a robbery and extortion.

In violation of Title 18, United States Code, Sections 1951 and 2.

COUNT TWENTY-EIGHT

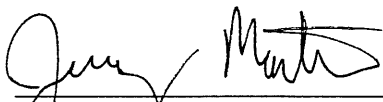
THE GRAND JURY FURTHER CHARGES:

On or about September 13, 2009, in the Middle District of Tennessee, [22] **BIONCA BUTLER a/k/a "C-TRILL"** did knowingly possess and discharge a firearm in furtherance of a crime of violence for which she may be prosecuted in a court of the United States, that is, conspiracy to commit a Hobbs Act extortion and robbery in violation of Title 18, United States Code, Section 1951.

In violation of Title 18, United States Code, Sections 924(c) and 2.

A TRUE BILL


FOREPERSON



JERRY E. MARTIN
UNITED STATES ATTORNEY


SUNNY A.M. KOSHY

ASSISTANT UNITED STATES ATTORNEY